

**ENGINEERING EVALUATION**  
**East Bay Generator; PLANT #13960**  
**APPLICATION #4536**

**BACKGROUND**

East Bay Generator is applying for an Authority to Construct/Permit to Operate a spray paint operation to paint generator metal parts.

The source is describe as follow:

S-1 Dayton Paint Spray Booth with Speedair HVLP Gun

**EMISSIONS SUMMARY**

S-1:

coating	VOC Content lb/gal	Usage gal/yr	Reg.8 Rule 19
coating	2.7	200	2.8 lb/gal

POC(coating)=(200 gal/yr) (2.8 lb VOC/gal)/260 day= 2.16 lb/day

Cleanup: water

**PLANT CUMULATIVE INCREASE**

POC = .28 TPY (new)

**TOXIC RISK SCREENING ANALYSIS**

This application passed the Toxic Risk Screen Analysis (enclosed).

**STATEMENT OF COMPLIANCE**

The coating used in this project meets the requirement of Reg.8-19-302.2 (air dried coating on metal parts with no more than 2.8 lbs VOC/gal). Also, the spray application is HVLP that satisfy the spray application requirement of the rule.

The project is considered to be ministerial under the District's CEQA Regulation 2-1-311 and therefore, is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors and therefore, is not discretionary as defined by CEQA (Permit Handbook Chapter 5.6).

**BACT**

BACT was not triggered because POC emissions do not exceed 10 lbs/day.

**Offsets**

Offsets were not triggered because total POC emissions at the facility are less than 15 TPY as per Reg. 2-2-302.

The facility is located within 1,000 ft of a school and subject to the Public School Notification( Reg. 3-318).

NESHAPS, PSD and NSPS do not apply.

**PERMIT CONDITIONS.**

- 1) The following annual coating usage limits at S-1 shall not be exceeded in any consecutive twelve month period:  
(basis:cumulative increase)  
  
Coating                      200 gal/yr @ 2.8 lb VOC/gal
- 2) In order to demonstrate compliance with the above conditions, the following records shall be maintained in a District approved log. These record shall be kept on site and made available for District inspection for a period of 24 months from the date on which a record is made.  
(basis: record keeping)
  - a) The type, VOC content, and amount of coating used

**RECOMMENDATION**

Issue a conditional Permit to Operate for the following source:

S-1 Dayton Paint Spray Booth with Speedair HVLP Gun

By: \_\_\_\_\_  
AQ Engineer II

\_\_\_\_\_  
Date